

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
<p>BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com <i>Counsel for the Official Committee of Unsecured Creditors</i> -and- GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com <i>Local Counsel for the Official Committee of Unsecured Creditors</i></p>	<p>BROWN RUDNICK LLP Stephen D. Palley, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (617)536-1766 Fax: (617)289-0466 Email: spalley@brownrudnick.com</p>
<p>In re:</p> <p>BLOCKFI INC., et al.,</p> <p style="text-align: right;">Debtors.¹</p>	<p>Chapter 11</p> <p>Case No. 22-19361 (MBK)</p> <p>Jointly Administered</p>

**CERTIFICATION OF DAVID NEU IN SUPPORT OF
APPLICATION FOR RETENTION OF MILLER NASH LLP
AS SPECIAL LOCAL WASHINGTON COUNSEL TO THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

I, David Neu, being of full age, certify as follows:

1. I am seeking authorization to be retained as Special Local Washington Counsel.
2. My professional credentials include: I have been practicing in the area of insolvency/creditors' rights, as well as commercial litigation, for over 20 years with both K&L Gates, LLP and Miller Nash, LLP. I have represented debtors, creditor committees, creditors, and trustees in numerous Chapter 11 proceedings. I was a Ninth Circuit Lawyer Representative from 2018-2023, and am the former President of the Turnaround Management Association, Northwest Chapter.
3. I am a member of or associated with the firm of Miller Nash, LLP, 605 5th Ave. S., Suite 900, Seattle, WA 98104.
4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

Miller Nash will bill on an hourly rate. I will be the primary attorney on the matter. My hourly rate is \$625 per hour. Time devoted by paralegals is charged at billing rates ranging from \$245 to \$330 per hour. These billing rates may be adjusted annually.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- ☐ None
- ☒ Describe connection: See no. 6 below.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- ☐ None

☒ Describe Connection:

Through local counsel for the Committee, Genova Burns, I have been provided a list of potentially interested parties in the Chapter 11 Case (the "Interested Parties"). To the extent that information was available, I undertook a detailed, good faith search to determine and to disclose, as set forth herein, whether I have represented or currently represent any parties-in-interest identified by such list in any substantively unrelated matters. The identities of the Interested Parties are set forth on **Exhibit B** attached hereto.

In preparing this Certification, I (or others under my control) searched my records (if available) for the names and matter descriptions of current and previous engagements handled by me. To the extent the information is available, the search identified parties whom I have represented or currently represent that also are Interested Parties listed in **Exhibit A**.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

- ☒ do not hold an adverse interest to the estate.
- ☒ do not represent an adverse interest to the estate.
- ☒ are disinterested under 11 U.S.C. § 101(14).
- ☒ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).
- ☐ Other. Explain:

8. If the professional is an auctioneer,

The following are my qualifications and experience with the liquidation or sale of similar property: _____

b. The proposed method of calculation of my compensation, including rates and formulas, is: _____

Pursuant to D.N.J. 2014-2, I ☐ do or ☐ do not request a waiver of the requirements of D. N. J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: _____

d. Have you, or a principal of your firm, been convicted of a criminal offense?

☐ No ☐ Yes (explain below)

e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: _____

10. The following information is provided pursuant to paragraph D.1 of the U.S. Trustee Guidelines.

a) Miller Nash will comply with the United States Trustee's Fee Guidelines in connection with this engagement and has not agreed to variations from standard customary billing arrangements.

b) None of the professionals included in this engagement vary their rate based on the geographic location of the bankruptcy case.

c) The Committee has approved Miller Nash's general staffing plan, as detailed in this certification.

I certify under penalty of perjury that the above information is true.

Date: June 9, 2023

/s/ David Neu
Signature of Professional

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